

EXHIBIT 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

JESSICA DERUBBIO, DOMINICK
DERUBBIO, ANTHONY DERUBBIO,
ANTHONY DESPERITO, DAVID
DESPERITO, LAURA DESPERITO-
FILBERTO, KATHLEEN A. DEVLIN, DINA
DOANY-AZZAM, CATHERINE FLEMING,
CHANG KIM, GEORGE CUELLER, APRIL
HORTON, ANDREA STAUTER, JOHN
CHURCHILL, ITAUMA ETTE, MARY
FARINO, KATHRYN NESBIT, LORI
FEELY, PETER FEGAN, ANGELA FIELDS,
LAURIE PATER, ELAINE CUNNEA,
RAYMOND FORDE, DOREPHA FORDE,
DORNA FORDE, DOROLYNE FORDE,
MYRNA THOMAS, SHIRLEY FOREMAN,
RAYMOND DURANT, JOSEPH FRANCIS,
PETER FRANCIS, TROY FRANCIS, ELLEN
VIGEANT, ALLEN FREEMAN, PAMELA
FREIMAN-RENTZER, AUDREY ADES,
RICHARD FRIEDMAN-FOX, DANIEL
FROST, ROSE COSTELLO, REBECCA
LOETHEN, MARY GERAGHTY, DEBRA
GIORDANO, ANNETE HERMAN, INGRID
JAFFE, RAFAEL HERMAN, TATIANA R.
GOMEZ, TATIANA S. GOMEZ, DORA
MURILLO, DAVID GORDENSTEIN,
ERIKA LUTZNER, TERESA GRANADOS,
LAWRENCE GRAY, MATTHEW GREEN,
MELROSE MORRIS GREEN, SANDRA
JAMERSON, TOMMY SMITH, JENNIFER
GREEN, JOE GREEN, ASERENE SMITH,
JUNE GRIFFIN, LISA GROUZALIS,
MYRTA GSCHAAR, JANE GYULAVARY,
DEBORAH KHUBLALL, GARY MCKINZY,
HERMAN HALMON, TALAT HAMDANI,
JEANNE KEATING, BEVERLY
HARRINGTON, ROBERT J.
HARRINGTON, DAWN HASKELL-
CARBONE, KEVIN HASKELL, KEVIN

Civil Docket Number: 18-5306

**SHORT FORM COMPLAINT AND
DEMAND FOR TRIAL BY JURY**

ECF CASE

HASKELL, DAWN HASKELL, JACOB
HEBER, ROBERT B. JR. HEMENWAY,
PAMELA DIXON, SHERARD DIXON,
JATAIR PERSOL-HODGES, ROBERT
HOFMILLER, DAVID CANNELLA, LINDA
HOUSTON, BRIAN HOWLEY, JOANNE
HRYCAK, LINDA HULSE, STEPHEN
HYLAND, RACHEL JAMES, MICHAEL
JAMES, MICHAEL ZINKOFSKY, JEFFREY
JENKINS, ZAMANI DAVIS, VERONICA
JOHN, ROYSTON ROACH, CHARLENE
CUMBERBATCH, PATRICIA JONES,
GARY JONES, LEANDER JONES, TERI
MARSHALL, MARIA JURGENS,

PLAINTIFFS,

v.

ISLAMIC REPUBLIC OF IRAN,

DEFENDANT.

IRAN SHORT FORM COMPLAINT

Plaintiffs file this Short Form Complaint against Defendant Islamic Republic of Iran (“Iran”) arising out of the September 11, 2001 terrorist attacks (“September 11, 2001 Terrorist Attacks”) as named herein by and through the undersigned counsel.

Plaintiffs incorporates by reference the specific allegations, as indicated below, of the *Burnett, et al. v. Islamic Republic of Iran et al.*, Amended Complaint, 15-cv-9903 (S.D.N.Y.) (GBD) (SN) Doc. No. 53 (hereinafter the “*Burnett* Iran Complaint”).

Plaintiffs file this *Iran Short Form Complaint* as permitted and approved by the Court’s Order of May 25, 2018, 2018, ECF No. 4010 in 1:03-md-01570-GBD-SN.

Upon filing of this *Iran Short Form Complaint*, Plaintiffs are deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all

causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, Plaintiffs incorporate the factual allegations and findings contained in those pleadings and orders filed, *inter alia*, at *Havlish v. Bin Laden*, Docket No. 1:03-cv-9848, ECF Nos. 263, 294, 295 (S.D.N.Y. Dec. 22, 2011); *Havlish v. Bin Laden*, 03 MDL 1570, ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before Hon. George B. Daniels on December 15, 2011 (ECF No. 2540).

This *Iran Short Form Complaint* relates solely to Defendant Iran, and does not apply to any other defendant.

VENUE

1. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1), as a substantial part of the events giving rise to the claims asserted herein occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 2334(a).

JURISDICTION

2. Jurisdiction against Iran is premised on the grounds set forth in the complaints specified below, including but not limited to 28 U.S.C. § 1605(a) (tort exception to the Foreign Sovereign Immunities Act), 28 U.S.C. § 1605A (terrorism exception to the Foreign Sovereign Immunities Act) and 28 U.S.C. § 1605B (Justice Against Sponsors of Terrorism Act).

CAUSES OF ACTION

3. Plaintiffs hereby adopt and incorporate by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☐ *Ashton Iran Complaint*, Docket Number 02-cv-6977 (S.D.N.Y.) (GBD)(SN) (03-md-1570 ECF Doc. No. 3237)

X *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53)

4. In addition, Plaintiffs hereby assert the following additional causes of action:

X *Iran Short Form Complaint* First Cause of Action to Recover Wrongful Death Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiffs allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the *Havlish* filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

☐ *Iran Short Form Complaint* First Cause of Action to Recover Personal Injury Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiff(s) allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the *Havlish* filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

5. Plaintiffs are making such claim on the following basis, and incorporates by reference that supplemental information provided on Appendix 1 to the *Iran Short Form Complaint*, identifying the Plaintiffs asserted basis for participating in this suit:

- ☒ Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☒ Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

IDENTIFICATION OF PLAINTIFFS

6. The following allegations and information are alleged on behalf of each individual who is bringing this claim, as indicated on Appendix 1 to this *Iran Short Form Complaint*, herein referred to as "Plaintiffs."

- a. The citizenship/nationality of each Plaintiff is indicated at Appendix 1 to this *Iran Short Form Complaint*.
- b. Plaintiff is entitled to recover damages on the causes of action set forth in the complaint identified above, as joined by this *Iran Short Form Complaint*, and as further asserted within this *Iran Short Form Complaint*.
- c. As indicated at Appendix 1, Plaintiff (i) is the estate representative of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; (ii) is the surviving immediate family member of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; and/or (iii) suffered physical injuries as a result of the September 11, 2001 Terrorist Attacks.
- d. For those plaintiffs with personal injury claims, as indicated in Appendix 1, related to the September 11, 2001 Terrorist Attacks, said Plaintiff was present at the Pentagon and/or the World Trade Center site and/or its surroundings and/or lower Manhattan and/or at an area wherein he/she was exposed to toxins as a result of the terrorist attacks and was exposed to toxins from the attacks, and/or was otherwise injured, and/or as otherwise alleged, as stated specifically in Appendix 1.
- e. For those plaintiffs with personal injury and/or wrongful death claims, as indicated in Appendix 1, as a direct, proximate and foreseeable result of Defendant's actions or inactions, Plaintiff or his or her decedent suffered

bodily injury and/or death, and consequently economic and other losses, including but not limited to pain and suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and/or as described in the *Iran Short Form Complaint*, and/or as otherwise may be specified in subsequent discovery proceedings, and/or as otherwise alleged in Appendix 1.

- f. The name, relationship to the injured and/or deceased September 11 victim, residency, citizenship/nationality, and the general nature of the claim for each plaintiff asserting wrongful death and/or personal injury claims is listed on the attached Appendix 1, and is incorporated herein as allegations, with all allegations of the related complaints, as specified above, deemed alleged as to each plaintiff.

IDENTIFICATION OF THE DEFENDANT

7. The only Defendant named in this *Short Form Complaint* is the Islamic Republic of Iran.

NO WAIVER OF OTHER CLAIMS

8. By filing this *Short Form Complaint*, Plaintiffs are not waiving any right to file suit against any other potential defendants or parties.
9. By filing this *Iran Short Form Complaint*, Plaintiffs are not opting out of any class that the Court may certify in the future.

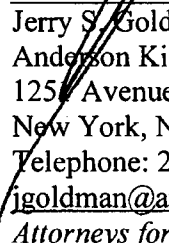
WHEREFORE, Plaintiffs pray for relief and judgment against Defendant as set forth in the *Burnett Iran Complaint*, as indicated above.

JURY DEMAND

Plaintiffs hereby demand a trial by jury as to the claims in this action.

Dated: June 12, 2018

Respectfully submitted,



Jerry S. Goldman
Anderson Kill P.C.
1250 Avenue of the Americas
New York, New York
Telephone: 212-278-1000
jgoldman@andersonkill.com
Attorneys for Plaintiffs

See Appendix 1 Annexed

APPENDIX 1 TO THE IRAN SHORT FORM COMPLAINT

Each line below is deemed an allegation, incorporating the allegations, language and references within the *Burnett* Amended Complaint as noted in the Iran Short Form Complaint to which this Appendix is appended. All allegations below shall be referenced as Allegation 1 of Appendix 1 to Iran Short Form Complaint, Allegation 2 of Appendix 1 to the Iran Short Form Complaint, etc.

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
1	DeRubbio, Jessica	NY	DeRubbio, David P.	Daughter	United States	United States	Solatium
2	DeRubbio, Dominick	NY	DeRubbio, David P.	Brother	United States	United States	Solatium
3	DeRubbio, Anthony	NH	DeRubbio, David P.	Brother	United States	United States	Solatium
4	Desperito, Anthony	FL	Desperito, Andrew	Son	United States	United States	Solatium
5	Desperito, David	FL	Desperito, Andrew	Son	United States	United States	Solatium
6	Desperito-Filberto, Laura	FL	Desperito, Andrew	Spouse	United States	United States	Solatium
7	Devlin, Kathleen A.	NY	Devlin, Dennis L.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
8	Doany-Azzam, Dina	VA	Doany, Ramzi A.	Sister/PR	United States	Jordan	Solatium/ Wrongful Death
9	Fleming, Catherine	WA	Don Kim, Lawrence	Sister	United States	United States	Solatium
10	Kim, Chang	WA	Don Kim, Lawrence	Father	United States	United States	Solatium
11	Cueller, George	NJ	Dudek, Luke	Life Partner (spousal equivalent) /PR	United States	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
12	Horton, April	CA	Earhart, Edward T.	Sister	United States	United States	Solatium
13	Stauter, Andrea	KY	Earhart, Edward T.	Sister	United States	United States	Solatium
14	Churchill, John	NJ	Eichler, John E.	PR	United States	United States	Solatium/ Wrongful Death
15	Ette, Itauma	NY	Ette, Sadie	Brother/PR	Nigeria	United States	Solatium/ Wrongful Death
16	Farino, Mary	NY	Farino, Thomas	Spouse/PR	United States	United States	Solatium/ Wrongful Death
17	Nesbit, Kathryn	GA	Farmer, Elizabeth A.	Daughter	United States	United States	Solatium
18	Feely, Lori	NY	Feely, Francis J.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
19	Fegan, Peter	NY	Fegan, Sean B.	Father/PR	United States	United States	Solatium/ Wrongful Death
20	Fields, Angela	GA	Fields, Samuel Sr.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
21	Pater, Laurie	NJ	Fogel, Stephen M.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
22	Cunnea, Elaine	United Kingdom	Forde, Godwin	Sister	United Kingdom	United Kingdom	Solatium
23	Forde, Raymond	United Kingdom	Forde, Godwin	Brother	United Kingdom	United Kingdom	Solatium
★ 24	Forde, Dorepha	United Kingdom	Forde, Godwin	Mother	United Kingdom	United Kingdom	Solatium
25	Forde, Dorna	United Kingdom	Forde, Godwin	Sister	United Kingdom	United Kingdom	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
26	Forde, Dorolyne	NC	Forde, Godwin	Sister	United Kingdom	United Kingdom	Solatium
27	Thomas, Myrna	United Kingdom	Forde, Godwin	Sister	United Kingdom	United Kingdom	Solatium
28	Foreman, Shirley	NY	Foreman, Donald A.	Mother/PR	United States	United States	Solatium/ Wrongful Death
29	Durant, Raymond	PA	Francis, Virgin	Son	Barbados	United States	Solatium
30	Francis, Joseph	NY	Francis, Virgin	Son	United States	United States	Solatium
31	Francis, Peter	Barbados W.I.	Francis, Virgin	Son	Barbados	United States	Solatium
32	Francis, Troy	NY	Francis, Virgin	Son	Barbados	United States	Solatium
33	Vigeant, Ellen	NJ	Frank, Gary J.	Mother/PR	United States	United States	Solatium/ Wrongful Death
34	Freeman, Allen	NC	Freeman, Tamitha	Father/PR	United States	United States	Solatium/ Wrongful Death
35	Freiman- Rentzer, Pamela	NY	Freiman, Brett O.	Sister/PR	United States	United States	Solatium/ Wrongful Death
36	Ades, Audrey	FL	Friedman, Paul	Spouse	United States	United States	Solatium
37	Friedman- Fox, Richard	FL	Friedman, Paul	Son	United States	United States	Solatium
38	Frost, Daniel	CO	Frost, Lisa	Brother	United States	United States	Solatium
39	Costello, Rose	NY	Gallagher, Anthony E.	Mother/PR	United States	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
40	Loethen, Rebecca	CA	Geis, Julie M.	Life Partner (spousal equivalent)/P R	United States	United States	Solatium/ Wrongful Death
41	Geraghty, Mary	NY	Geraghty, Edward F.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
42	Giordano, Debra	NY	Giordano, Jeffrey J.	Sister	United States	United States	Solatium
43	Herman, Annete	FL	Goldstein, Michelle H.	Sister	United States	United States	Solatium
44	Jaffe, Ingrid	FL	Goldstein, Michelle H.	Mother	United States	United States	Solatium
45	Herman, Rafael	FL	Goldstein, Michelle H.	Father	United States	United States	Solatium
46	Gomez, Tatiana R.	NY	Gomez, Wilder A.	Spouse	Ecuador	Colombia	Solatium
47	Gomez, Tatiana S.	NY	Gomez, Wilder A.	Daughter	United States	Colombia	Solatium
48	Murillo, Dora	NY	Gonzalez, Mauricio	Sister/PR	United States	United States	Solatium/ Wrongful Death
49	Gordenstein, David	MA	Gordenstein, Lisa F.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
50	Lutzner, Erika	NY	Grabowski, Jon R.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
51	Granados, Teresa	NY	Granados, Gilbert	Spouse/PR	United States	United States	Solatium/ Wrongful Death
52	Gray, Lawrence	NY	Gray, Tara McCloud	Spouse/PR	United States	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
53	Green, Matthew	FL	Green, Andrew Peter Charles Curry	Brother	United States	United States	Solatium
54	Morris Green, Melrose	NY	Green, Derrick A.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
55	Jamerson, Sandra	CA	Green, Wanda	Sister	United States	United States	Solatium
56	Smith, Tommy	CA	Green, Wanda	Brother	United States	United States	Solatium
57	Green, Jennifer	NJ	Green, Wanda	Daughter	United States	United States	Solatium
58	Green, Joe	NJ	Green, Wanda	Son	United States	United States	Solatium
59	Smith, Aserene	CA	Green, Wanda	Mother	United States	United States	Solatium
60	Griffin, June	NJ	Griffin, John M.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
61	Grouzalis, Lisa	NJ	Grouzalis, Kenneth	Daughter	United States	United States	Solatium
62	Gschaar, Myrta	MI	Gschaar, Robert	Spouse	United States	United States	Solatium
63	Gyulavary, Jane	NY	Gyulavary, Peter	Spouse/PR	United States	Australian	Solatium/ Wrongful Death
64	Khublall, Deborah	NY	Hafiz, Nezam	Sister/PR	United States	United States	Solatium/ Wrongful Death
65	McKinzy, Gary	AR	Hale-McKinzy, Diane	Spouse	United States	United States	Solatium
66	Halmon, Herman	SC	Halmon, Carolyn	Spouse/PR	United States	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
67	Hamdani, Talat	NY	Hamdani, Mohammad S.	Mother/PR	United States	United States	Solatium/ Wrongful Death
68	Keating, Jeanne	NJ	Hanlon Keating, Paul	Sister	United States	United States	Solatium
69	Harrington, Beverly	MA	Harrington- Hughes, Melissa M.	Mother	United States	United States	Solatium
70	Harrington, Robert J.	MA	Harrington- Hughes, Melissa M.	Father	United States	United States	Solatium
71	Haskell- Carbone, Dawn	NY	Haskell, Thomas	Sister	United States	United States	Solatium
72	Haskell, Kevin	NY	Haskell, Thomas	Brother	United States	United States	Solatium
73	Haskell, Kevin	NY	Haskell, Timothy	Brother	United States	United States	Solatium
74	Haskell, Dawn	NY	Haskell, Timothy	Sister	United States	United States	Solatium
75	Heber, Jacob	NY	Heber, Roberta B.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
76	Hemenway, Robert B. Jr.	MO	Hemenway, Ronald J.	Brother	United States	United States	Solatium
77	Dixon, Pamela	NY	Hodges, DaJuan	Mother	United States	United States	Solatium
78	Dixon, Sherard	NY	Hodges, DaJuan	Brother	United States	United States	Solatium
79	Persol- Hodges, Jatair	NJ	Hodges, DaJuan	Daughter	United States	United States	Solatium
80	Hofmiller, Robert	CT	Hofmiller, Judith	Brother	United States	United States	Solatium
81	Cannella, David	CT	Hofmiller, Judith	Son	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
82	Houston, Linda	NY	Houston, Charles J.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
83	Howley, Brian	NY	Howley, Jennifer L.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
84	Hrycak, Joanne	NY	Hrycak, Marian R.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
85	Hulse, Linda	NY	Hulse, Lamar D.	Mother/PR	United States	United States	Solatium/ Wrongful Death
86	Hyland, Stephen	CA	Hyland, Stephen N.	Father/PR	United States	United States	Solatium/ Wrongful Death
87	James, Rachel	NY	James, Ernest	Sister/PR	United States	United States	Solatium/ Wrongful Death
88	James, Michael	Honduras	James, Gricelda E.	Spouse/PR	Honduran	Honduran	Solatium/ Wrongful Death
89	Zinkofsky, Michael	NY	Jean-Pierre, Maxima	Spouse/PR	United States	United States	Solatium/ Wrongful Death
90	Jenkins, Jeffrey	KY	Jenkins, John C.	Brother	United States	United States	Solatium
91	Davis, Zamani	GA	John, Charles G.	Brother	United States	United States	Solatium
92	John, Veronica	GA	John, Charles G.	Mother	United States	United States	Solatium
93	Roach, Royston	GA	John, Charles G.	Brother	United States	United States	Solatium
94	Cumberbatch, Charlene	NY	John, Charles G.	Sister	United States	United States	Solatium
95	Jones, Patricia	NY	Jones, Brian L.	Mother	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
96	Jones, Gary	TX	Jones, Brian L.	Brother	United States	United States	Solatium
97	Jones, Leander	NY	Jones, Brian L.	Father	United States	United States	Solatium
98	Marshall, Teri	MD	Jones, Brian L.	Sister	United States	United States	Solatium
99	Jurgens, Maria	NY	Jurgens, Paul W.	Spouse/PR	United States	United States	Solatium/ Wrongful Death

28 USC 1608 Summons IH 6

4/17

UNITED STATES DISTRICT COURT
for the
Southern District of New York

JESSICA DERUBBIO, ET AL. (see
appendix)

Plaintiff

v.

ISLAMIC REPUBLIC OF IRAN

Defendant

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Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) ISLAMIC REPUBLIC OF IRAN,
c/o Permanent Mission of Iran
to the United Nations
622 Third Avenue
New York, NY 10017

A lawsuit has been filed against you.

Within 60 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jerry S. Goldman, Esq.
ANDERSON KILL P.C.
1251 Avenue of the Americas
New York, NY 10020
(212) 278-1000
jgoldman@andersonkill.com

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

28 USC 1608 Summons (12/11) (Page 2)

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

▸ I personally served the summons on the individual at *(place)* _____
 on *(date)* _____; or

▸ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

▸ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 on *(date)* _____; or

▸ I returned the summons unexecuted because _____; or

▸ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

APPENDIX

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
1	DeRubbio, Jessica	NY	DeRubbio, David P.	Daughter	United States	United States	Solatium
2	DeRubbio, Dominick	NY	DeRubbio, David P.	Brother	United States	United States	Solatium
3	DeRubbio, Anthony	NH	DeRubbio, David P.	Brother	United States	United States	Solatium
4	Desperito, Anthony	FL	Desperito, Andrew	Son	United States	United States	Solatium
5	Desperito, David	FL	Desperito, Andrew	Son	United States	United States	Solatium
6	Desperito- Filberto, Laura	FL	Desperito, Andrew	Spouse	United States	United States	Solatium
7	Devlin, Kathleen A.	NY	Devlin, Dennis L.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
8	Doany- Azzam, Dina	VA	Doany, Ramzi A.	Sister/PR	United States	Jordan	Solatium/ Wrongful Death
9	Fleming, Catherine	WA	Don Kim, Lawrence	Sister	United States	United States	Solatium
10	Kim, Chang	WA	Don Kim, Lawrence	Father	United States	United States	Solatium
11	Cueller, George	NJ	Dudek, Luke	Life Partner (spousal equivalent) /PR	United States	United States	Solatium/ Wrongful Death
12	Horton, April	CA	Earhart, Edward T.	Sister	United States	United States	Solatium
13	Stauter, Andrea	KY	Earhart, Edward T.	Sister	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
14	Churchill, John	NJ	Eichler, John E.	PR	United States	United States	Solatium/ Wrongful Death
15	Ette, Itauma	NY	Ette, Sadie	Brother/PR	Nigeria	United States	Solatium/ Wrongful Death
16	Farino, Mary	NY	Farino, Thomas	Spouse/PR	United States	United States	Solatium/ Wrongful Death
17	Nesbit, Kathryn	GA	Farmer, Elizabeth A.	Daughter	United States	United States	Solatium
18	Feely, Lori	NY	Feely, Francis J.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
19	Fegan, Peter	NY	Fegan, Sean B.	Father/PR	United States	United States	Solatium/ Wrongful Death
20	Fields, Angela	GA	Fields, Samuel Sr.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
21	Pater, Laurie	NJ	Fogel, Stephen M.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
22	Cunnea, Elaine	United Kingdom	Forde, Godwin	Sister	United Kingdom	United Kingdom	Solatium
23	Forde, Raymond	United Kingdom	Forde, Godwin	Brother	United Kingdom	United Kingdom	Solatium
24	Forde, Dorepha	United Kingdom	Forde, Godwin	Mother	United Kingdom	United Kingdom	Solatium
25	Forde, Dorna	United Kingdom	Forde, Godwin	Sister	United Kingdom	United Kingdom	Solatium
26	Forde, Dorolyne	NC	Forde, Godwin	Sister	United Kingdom	United Kingdom	Solatium
27	Thomas, Myrna	United Kingdom	Forde, Godwin	Sister	United Kingdom	United Kingdom	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
28	Foreman, Shirley	NY	Foreman, Donald A.	Mother/PR	United States	United States	Solatium/ Wrongful Death
29	Durant, Raymond	PA	Francis, Virgin	Son	Barbados	United States	Solatium
30	Francis, Joseph	NY	Francis, Virgin	Son	United States	United States	Solatium
31	Francis, Peter	Barbados W.I.	Francis, Virgin	Son	Barbados	United States	Solatium
32	Francis, Troy	NY	Francis, Virgin	Son	Barbados	United States	Solatium
33	Vigeant, Ellen	NJ	Frank, Gary J.	Mother/PR	United States	United States	Solatium/ Wrongful Death
34	Freeman, Allen	NC	Freeman, Tamitha	Father/PR	United States	United States	Solatium/ Wrongful Death
35	Freiman- Rentzer, Pamela	NY	Freiman, Brett O.	Sister/PR	United States	United States	Solatium/ Wrongful Death
36	Ades, Audrey	FL	Friedman, Paul	Spouse	United States	United States	Solatium
37	Friedman- Fox, Richard	FL	Friedman, Paul	Son	United States	United States	Solatium
38	Frost, Daniel	CO	Frost, Lisa	Brother	United States	United States	Solatium
39	Costello, Rose	NY	Gallagher, Anthony E.	Mother/PR	United States	United States	Solatium/ Wrongful Death
40	Loethen, Rebecca	CA	Geis, Julie M.	Life Partner (spousal equivalent)/P R	United States	United States	Solatium/ Wrongful Death
41	Geraghty, Mary	NY	Geraghty, Edward F.	Spouse/PR	United States	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
42	Giordano, Debra	NY	Giordano, Jeffrey J.	Sister	United States	United States	Solatium
43	Herman, Annete	FL	Goldstein, Michelle H.	Sister	United States	United States	Solatium
44	Jaffe, Ingrid	FL	Goldstein, Michelle H.	Mother	United States	United States	Solatium
45	Herman, Rafael	FL	Goldstein, Michelle H.	Father	United States	United States	Solatium
46	Gomez, Tatiana R.	NY	Gomez, Wilder A.	Spouse	Ecuador	Colombia	Solatium
47	Gomez, Tatiana S.	NY	Gomez, Wilder A.	Daughter	United States	Colombia	Solatium
48	Murillo, Dora	NY	Gonzalez, Mauricio	Sister/PR	United States	United States	Solatium/ Wrongful Death
49	Gordenstein, David	MA	Gordenstein, Lisa F.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
50	Lutzner, Erika	NY	Grabowski, Jon R.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
51	Granados, Teresa	NY	Granados, Gilbert	Spouse/PR	United States	United States	Solatium/ Wrongful Death
52	Gray, Lawrence	NY	Gray, Tara McCloud	Spouse/PR	United States	United States	Solatium/ Wrongful Death
53	Green, Matthew	FL	Green, Andrew Peter Charles Curry	Brother	United States	United States	Solatium
54	Morris Green, Melrose	NY	Green, Derrick A.	Spouse/PR	United States	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
55	Jamerson, Sandra	CA	Green, Wanda	Sister	United States	United States	Solatium
56	Smith, Tommy	CA	Green, Wanda	Brother	United States	United States	Solatium
57	Green, Jennifer	NJ	Green, Wanda	Daughter	United States	United States	Solatium
58	Green, Joe	NJ	Green, Wanda	Son	United States	United States	Solatium
59	Smith, Aserene	CA	Green, Wanda	Mother	United States	United States	Solatium
60	Griffin, June	NJ	Griffin, John M.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
61	Grouzalis, Lisa	NJ	Grouzalis, Kenneth	Daughter	United States	United States	Solatium
62	Gschaar, Myrta	MI	Gschaar, Robert	Spouse	United States	United States	Solatium
63	Gyulavary, Jane	NY	Gyulavary, Peter	Spouse/PR	United States	Australian	Solatium/ Wrongful Death
64	Khublall, Deborah	NY	Hafiz, Nezam	Sister/PR	United States	United States	Solatium/ Wrongful Death
65	McKinzy, Gary	AR	Hale- McKinzy, Diane	Spouse	United States	United States	Solatium
66	Halmon, Herman	SC	Halmon, Carolyn	Spouse/PR	United States	United States	Solatium/ Wrongful Death
67	Hamdani, Talat	NY	Hamdani, Mohammad S.	Mother/PR	United States	United States	Solatium/ Wrongful Death
68	Keating, Jeanne	NJ	Hanlon Keating, Paul	Sister	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
69	Harrington, Beverly	MA	Harrington- Hughes, Melissa M.	Mother	United States	United States	Solatium
70	Harrington, Robert J.	MA	Harrington- Hughes, Melissa M.	Father	United States	United States	Solatium
71	Haskell- Carbone, Dawn	NY	Haskell, Thomas	Sister	United States	United States	Solatium
72	Haskell, Kevin	NY	Haskell, Thomas	Brother	United States	United States	Solatium
73	Haskell, Kevin	NY	Haskell, Timothy	Brother	United States	United States	Solatium
74	Haskell, Dawn	NY	Haskell, Timothy	Sister	United States	United States	Solatium
75	Heber, Jacob	NY	Heber, Roberta B.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
76	Hemenway, Robert B. Jr.	MO	Hemenway, Ronald J.	Brother	United States	United States	Solatium
77	Dixon, Pamela	NY	Hodges, DaJuan	Mother	United States	United States	Solatium
78	Dixon, Sherard	NY	Hodges, DaJuan	Brother	United States	United States	Solatium
79	Persol- Hodges, Jatair	NJ	Hodges, DaJuan	Daughter	United States	United States	Solatium
80	Hofmiller, Robert	CT	Hofmiller, Judith	Brother	United States	United States	Solatium
81	Cannella, David	CT	Hofmiller, Judith	Son	United States	United States	Solatium
82	Houston, Linda	NY	Houston, Charles J.	Spouse/PR	United States	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
83	Howley, Brian	NY	Howley, Jennifer L.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
84	Hrycak, Joanne	NY	Hrycak, Marian R.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
85	Hulse, Linda	NY	Hulse, Lamar D.	Mother/PR	United States	United States	Solatium/ Wrongful Death
86	Hyland, Stephen	CA	Hyland, Stephen N.	Father/PR	United States	United States	Solatium/ Wrongful Death
87	James, Rachel	NY	James, Ernest	Sister/PR	United States	United States	Solatium/ Wrongful Death
88	James, Michael	Honduras	James, Gricelda E.	Spouse/PR	Honduran	Honduran	Solatium/ Wrongful Death
89	Zinkofsky, Michael	NY	Jean-Pierre, Maxima	Spouse/PR	United States	United States	Solatium/ Wrongful Death
90	Jenkins, Jeffrey	KY	Jenkins, John C.	Brother	United States	United States	Solatium
91	Davis, Zamani	GA	John, Charles G.	Brother	United States	United States	Solatium
92	John, Veronica	GA	John, Charles G.	Mother	United States	United States	Solatium
93	Roach, Royston	GA	John, Charles G.	Brother	United States	United States	Solatium
94	Cumberbatch, Charlene	NY	John, Charles G.	Sister	United States	United States	Solatium
95	Jones, Patricia	NY	Jones, Brian L.	Mother	United States	United States	Solatium
96	Jones, Gary	TX	Jones, Brian L.	Brother	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
97	Jones, Leander	NY	Jones, Brian L.	Father	United States	United States	Solatium
98	Marshall, Teri	MD	Jones, Brian L.	Sister	United States	United States	Solatium
99	Jurgens, Maria	NY	Jurgens, Paul W.	Spouse/PR	United States	United States	Solatium/ Wrongful Death

IH-32

Rev: 2014-1

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Jessica DeRubbio, et al.

Plaintiff	Case Number
vs.	1:18-cv-05306
Islamic Republic of Iran	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

In re Terrorist Attacks on September 11,
2001

Plaintiff	Case Number
vs.	03 MDL 1570 (GBD)(SN)
Defendant	

IH-32

Rev: 2014-1

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

☒

Open

(If so, set forth procedural status and summarize any court rulings.)

Partial and/or full summary judgment as to Defendant Islamic Republic of Iran has been granted and ordered for select plaintiffs. This matter is still ongoing. On May 25, 2018, the Court entered an Order approving the "Iran Short Form Complaint" that is filed herewith. (See ECF No. 4010 in 1:03-md-01570-GBD-SN).

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

This is also a September 11th case for wrongful death that is against the sponsors of terrorism as the Defendant Islamic Republic of Iran is involved in the related MDL action. We are seeking similar relief in the form of damages from the Defendant. The Plaintiffs herein intend to participate in the underlying litigations as to the other defendants in due course. This case is also related to Estate of John Patrick O'Neill Sr., et al. v The Republic of Iraq, et al., 04-1076-GBN-SN; Thomas E. Burnett, Sr., in his own right as the Parent of Thomas E. Burnett, Jr., Deceased, et al. v. The Islamic Republic of Iran, et al., 15-cv-09903-GBN-SN; and Kathleen Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-06977-GBN-FM. The instant complaint is being filed in accordance with the Court's directive of May 25, 2018, ECF No. 4010 in 1:03-md-01570-GBD-SN.

Signature: _____

Jerry S. Goldman, Esq.
Anderson Kill P.C.

Date: June 7, 2018

Firm: _____